

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF NORTH CAROLINA
CHARLOTTE DIVISION

UNITED STATES OF AMERICA)
)
 v.)
)
(1) RASHEED PETER BURKE)
_____)

DOCKET NO. 3:24CR12-1-RJC

FACTUAL BASIS

NOW COMES the United States of America, by and through Dena J. King, United States Attorney for the Western District of North Carolina, and hereby files this Factual Basis.

This Factual Basis is filed pursuant to Local Criminal Rule 11.2 and does not attempt to set forth all of the facts known to the United States at this time. By their signatures below, the parties expressly agree that there is a factual basis for the guilty plea(s) that the defendant will tender pursuant to the plea agreement, and that the facts set forth in this Factual Basis are sufficient to establish all of the elements of the crime(s). The parties agree not to object to or otherwise contradict the facts set forth in this Factual Basis.

Upon acceptance of the plea, the United States will submit to the Probation Office a "Statement of Relevant Conduct" pursuant to Local Criminal Rule 32.4. The defendant may submit (but is not required to submit) a response to the Government's "Statement of Relevant Conduct" within seven days of its submission. The parties understand and agree that this Factual Basis does not necessarily represent all conduct relevant to sentencing. The parties agree that they have the right to object to facts set forth in the presentence report that are not contained in this Factual Basis. Either party may present to the Court additional relevant facts that do not contradict facts set forth in this Factual Basis.

1. From on or about June 25, 2019, and continuing to in or around April 2022, in Mecklenburg County, within the Western District of North Carolina, and elsewhere, defendant RASHEED PETER BURKE and other persons engaged in a criminal conspiracy, as described in paragraphs 5 through 12 of the Superseding Bill of Indictment, to violate 18 U.S.C. § 371 (conspiracy to violate federal criminal law).

2. BURKE, co-conspirators, and other persons executed the scheme to defraud the United States Postal Service ("USPS") by filing fraudulent domestic indemnity insurance claims

against the USPS for parcels they never mailed, resulting in their receipt of monetary payments for these fraudulent claims.

DENA J. KING
UNITED STATES ATTORNEY


KENNETH M. SMITH
ASSISTANT UNITED STATES ATTORNEY

Defendant's Counsel's Signature and Acknowledgment

I have read the Factual Basis and Superseding Bill of Indictment in this case, and I have discussed them with the defendant. Based on those discussions, I am satisfied that the defendant understands the Factual Basis and Superseding Bill of Indictment. I hereby certify that the defendant does not dispute this Factual Basis.


STEVEN SLAWINSKI
DEFENSE COUNSEL

DATE: November 18, 2024